

UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON

In re

Case No. _____
Amended

Debtor(s)

NOTICE OF CLAIM OBJECTION

Notice to Claimant. An objection by _____
to your claim in this bankruptcy case has been filed and is enclosed with this notice.

Your claim may be reduced, modified, or eliminated. You should read these papers carefully and discuss them with your attorney, if you have one.

If you do not want the court to eliminate or change your claim, then within 30 days from the service date below, you or your attorney must do one of the following:

1. Obtain a written withdrawal of the claim objection by the objector. In order to obtain a withdrawal, you may need to provide the objector with any documentation supporting your claim that was not included when you filed your claim with the court. You should send this documentation to the objector at the service address listed at the bottom of the claim objection. The written withdrawal of the objection must be filed with the court within 30 days of the service date below.
2. Prepare a written response to the objection, explaining your position, and file both the written response and a certificate showing a copy of the response has been served on the objector at the service address listed at the bottom of the claim objection with the clerk at 1050 SW 6th Ave #700, Portland, OR 97204 or 405 E 8th Ave #2600, Eugene, OR 97401. If you mail your response to the court for filing, you must mail it early enough so that the court will **receive** it within 30 days of the service date below.

If you or your attorney do not take one of these steps within 30 days of the service date below, the court may decide that you do not oppose the objection to your claim and reduce, modify, or eliminate your claim without further notice or a hearing.

I certify that on _____ (service date) this notice and the objection were served pursuant to Federal Rule of Bankruptcy Procedure (FRBP) 3007(a)(2) on the claimant, debtor or debtor in possession, trustee, and, if applicable, the entity filing the proof of claim under FRBP 3005, and that the names, addresses, and methods used for service are as follows (*attach additional page if necessary*):

Printed Name

Signature

UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON

In re

Case No. _____
Amended

Debtor(s)

CLAIM OBJECTION

1. The undersigned objects to proof of claim no. _____ (claim) in the amount of \$_____ filed on behalf of _____ (creditor).
2. The undersigned objects to the claim for the following reasons (*check all applicable reasons*):

Claim duplicates proof of claim no. _____ filed on behalf of _____.

Claim fails to assert grounds for priority, or grounds asserted are not valid as described below in "Other."

Claim was not filed on behalf of the real party in interest.

Claim appears to include interest or charges accrued after the petition date.

Value of collateral exceeds debt.

Claim arrearage asserted is incorrect.

Claim is a secured claim, but creditor neither (a) specified that any portion of claim should be treated as unsecured nor (b) requested a hearing to determine value of collateral.

Claim includes taxes assessed against real or personal property, but the interest of the estate in the property against which taxes were assessed has no value because estate has no equity or interest in the property.

Claim does not include documentation required by Federal Rule of Bankruptcy Procedure 3001(c) and (d) (for example, a copy of the note or documents establishing secured status or an assignment of the claim to creditor), and another reason for disallowance is stated in this objection.

Claim does not require future distribution because (state reason, for example, creditor obtained relief from stay or has been paid in full from another source):

_____.

Other:

3. The undersigned moves that the claim be (*check applicable boxes*):

Disallowed in full.

Disallowed for any distribution.

Disallowed for future distribution greater than the amount already paid (\$_____).

Allowed as (*fill in each blank even if amount is \$0*):

a secured claim for \$ _____,

a priority unsecured claim for \$ _____, and

a nonpriority unsecured claim for \$ _____.

Allowed with an arrearage of \$ _____ (if amount of arrearage is contested).

Date: _____

Signature: _____

Name: _____

Relation to Case: _____

Service Address: _____

Phone #: _____

Email Address: _____

Last 4 digits of Taxpayer ID# (if objector is debtor): _____

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Of Attorneys for Debtor Eric L. Silva

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON**

In re

ERIC L. SILVA

Debtor.

Case No. 19-34037-pcm12

OBJECTION TO CLAIM 29-1 OF
BOVERMAN & ASSOCIATES, LLC

Debtor Eric L. Silva (“**Debtor**”) hereby objects to Claim 29-1 (the “**Claim**”) filed by Boverman & Associates, LLC (“**Boverman**” or “**Receiver**”). Debtor asserts that the Claim seeks payment for unreasonable and excessive fees and costs, and requests that the Court only allow the Claim to the extent Receiver can meet his burden to prove that the fees and costs are reasonable and necessary.

INTRODUCTION

Prior to the commencement of this bankruptcy case, Boverman was appointed as receiver for the Debtor’s assets, consisting primarily of a dairy farm located in Beaver, Oregon. Boverman was superseded upon the commencement of this bankruptcy case on October 31, 2019. Boverman has filed Proof of Claim No. 29-1, seeking compensation for fees and

reimbursement for expenses and charges incurred prior to and after the filing of the bankruptcy petition.

Debtor does not dispute that Boverman is an experienced and capable professional, and that a majority of the compensation sought by Boverman is appropriate. However, Debtor objects to many of the fee and cost entries described in Boverman's claim, on the basis that such fees are unreasonable and excessive, and certain fees and costs did not benefit the estate. Additionally, Debtor objects to Boverman's post-petition attorney fees, to the extent those fees were not in furtherance of the superseded receiver's duties under § 543(a) and (b).

BACKGROUND

1. Debtor does not dispute the basic procedural background regarding the commencement of the state court action in Tillamook County Circuit Court. Specifically, Debtor agrees with the factual statements made in Paragraphs 3.1 through 3.4 of the Declaration of Craig G. Russillo, filed herein at ECF No. 94.

2. After the appointment of the Receiver, Debtor was initially hesitant to file bankruptcy, as it had been suggested to him that the Receiver would maximize the value of the Debtor's assets, and would be in the best position to sell the Debtor's assets, including the dairy farm, and repay the Debtor's outstanding debts.

3. Debtor continued to monitor the Receiver's activities, but was denied access to the dairy farm, and was regularly denied information requested from the Receiver.

4. Debtor was informed that various problems were occurring at the dairy farm, such as large quantities of milk being dumped due to improper handling and presence of antibiotics, which Debtor believes was due to incompetence in running the dairy farm.

5. Debtor and counsel met with Boverman and counsel on October 22, 2019. At that meeting, Mr. Boverman informed Debtor that the Receiver had not yet conducted a definitive inventory of the animals at the dairy. Boverman was unable to answer specific questions about critical segments of operations at the Dairy. Specifically, Boverman could not answer questions about the exact number of cows on the farm, and who was breeding the cows on days when Nathan Jensen (who had been employed by the Receiver) was away from the Dairy.

6. Concerned about the welfare of the farm and the animals, Debtor filed a Chapter 12 bankruptcy petition on October 31, 2019, and regained possession of the farm the next morning. Upon returning to the farm, Debtor found that cows had not been regularly bred—a critical component of running a dairy farm. Silva also found that feed stores were critically low, and that the health of the animals at the farm had deteriorated significantly.

7. Since regaining possession of the farm, Debtor has been able to restore the health of the animals, and increase milk production and revenue. Debtor's revenues have consistently exceeded expectations since the petition date.

ARGUMENT

1. Receiver Is Not Entitled to Its Professional Fees Because It Did Not Comply with Oregon Law.

As the Receiver has pointed out:

“The substance of a creditor's claim are determined by state law. *Travelers Cas. & Sur. Co. of America v. Pacific Gas and Electric Co.*, 549 U.S. 443-451 (2007) (state law governs the substance of claims in bankruptcy). Thus, to evaluate the aspects associated with the Receiver's claim, one needs to look to Oregon law.”

See ECF No. 83 (“*Receiver's Motion*”), at pp. 10-11. Said another way, in the process of allowing or disallowing a claim in bankruptcy, “the validity and legality of claims are determined by applicable nonbankruptcy law.” *In re S. California Plastics, Inc.*, 165 F.3d 1243,

1247 (9th Cir. 1999); citing *Christison v. Norm Ross Co. (In re Eastview Estates II)*, 713 F.2d 443, 447 (9th Cir.1983). A claim cannot be allowed if it is unenforceable under nonbankruptcy law, and “[t]he Trustee therefore may raise state law defenses to the claim.” . *Id.*; citing 11 U.S.C. § 502(b)(1). While Receiver has repeatedly argued that its rights are determined by state law, Receiver failed to mention that it did not comply with state law when hiring consultants and attorneys in the state receivership case.

Oregon law requires that, prior to employing attorneys and other professionals, a receiver give notice of the receiver’s intent to employ, and that such notice must disclose: (a) The identity and qualifications of the professional; (b) The scope and nature of the proposed engagement; (c) Any potential conflict of interest; and (d) the proposed compensation. ORS 37.310 (1)-(2). In addition to specifying the content of such a notice, ORS 37.170 specifies other procedural requirements of providing proper notice. Receiver failed to comply with both of these statutory provisions. As a result, Receiver was not authorized to employ the professionals Mike Anderson, Tara Graciano, and Foster Garvey. Such professionals’ fees total \$101,866.75, all of which should be disallowed.

Receiver has acknowledged its failure to comply with the Oregon Receivership Code, and has sought and obtained relief from the automatic stay to enable Receiver to tardily file the required notices in state court. As of the date of this objection, Receiver has not filed such notices. However, when such notices are filed, Debtor intends to oppose Receiver’s *nunc pro tunc* notices in state court. The Court should disallow all of Receiver’s professional fees, in the same way that a professional’s compensation would be disallowed in a bankruptcy case if a trustee or debtor in possession hired professionals without proper authority. In the alternative, the Court should reserve ruling on allowance of Receiver’s professional fees until the state court

determines whether Receiver's non-compliance with the statute bars recovery of Receiver's professional fees under state law.

2. Receiver's Claim Seeks Payment for Unreasonable and Excessive Fees and Costs, and Should be Reduced.

Even if Receiver is not completely barred from recovering professional fees for its non-compliance with the Oregon Receivership Code, Receiver's Claim should nevertheless be reduced to the extent it seeks payment for fees and costs that were not reasonable or necessary.

a. Legal Standard

Upon the commencement of a bankruptcy case, a pre-petition custodian is required to turn over all assets of the estate to the trustee or the Debtor. 11 U.S.C. § 543(b). If that requirement is timely satisfied, the superseded custodian is entitled to compensation:

There is no doubt that if the custodian complies with turnover as soon as is practical after the filing of the bankruptcy case, § 543(c)(2) allows pre-and-post-petition fees and costs to be awarded and paid by the estate. At that point, the receiver is compensated for his services and those of his appointees and although § 543(c)(2) sounds as though they will be paid immediately, it is more likely that they will be part of a later distribution of administrative expenses holding the priority given them under § 503(b)(3)(E) and § 503(b)(4).

In re Internet Specialties W., Inc., No. 1:12-BK-20897-GM, 2013 WL 4408456, at *4 (Bankr. C.D. Cal. July 17, 2013) (emphasis added).

Section 543(c)(2) deals with certain of the receiver's post-petition services, and "is limited to the 'winding up' duties imposed under sections 543(a) and (b)." *In re Posadas Assocs.*, 127 B.R. 278, 281–82 (Bankr. D.N.M. 1991); *see also, In re Bodenheimer, Jones, Szwak, & Winchell L.L.P.*, 592 F.3d 664, 674 (5th Cir. 2009) ("the language of § 543 clearly circumscribes the actions of superseded custodians to those which are necessary to preserve the assets of the estate once a bankruptcy petition has been filed"). While § 543(c) indicates that a custodian's "reasonable" fees and costs will be awarded, the specific treatment of those fees and

costs is governed by § 503(b)(3)(E) and § 503(b)(4).

Under § 503(b), there shall be an allowed administrative expense for “the *actual, necessary* expenses” incurred by a court-appointed custodian superseded under § 543, and compensation for the services of such custodian. 11 U.S.C. § 503(b)(3)(E) (emphasis added); see *In re Sevitski*, 161 B.R. 847, 856 (Bankr.N.D.Okla.1993) (denying custodian’s request for administrative expense priority for his fees and expenses because they were unreasonable and excessive). The determination of what is “reasonable” is a question of federal law and is to be determined by the standards established by bankruptcy law, not state law. *In re 400 Madison Ave. Ltd. P’ship*, 213 B.R. 888, 897 (Bankr.S.D.N.Y.1997); citing *Gross v. Irving Trust*, 289 U.S. 342, 345, 53 S.Ct. 605, 77 L.Ed. 1243 (1933). “The inquiry is little different from that concerning other professional fees and expenses under 11 U.S.C. § 330(a)(1), § 503(b)(2). Therefore, the same standards governing other professional fees and expenses should govern receiver's fees and expenses too—unless good reason appears to apply different standards.” *In re Sevitski*, 161 B.R. at 854.

The burden is on the receiver to establish that the fees and expenses he seeks were actually incurred, were necessary, and were of benefit to the estate. *In re S.T.N. Enterprises, Inc.*, 70 B.R. 823, 831–32 (Bankr.D.Vt.1987); *R & G Properties, Inc.*, No. 08-10876, 2009 WL 1396285, at *2–3 (Bankr. D. Vt. Apr. 30, 2009). The superseded custodian is not entitled to administrative priority “where the custodian incurs costs not for complying with the turnover provisions of the Code but for resisting turnover[.]” *Internet Specialties*, WL 4408456, at *5; citing *In re Posadas Associates*, 127 B.R. 278, 282 (D.N.M.1991).

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b. Receiver's Unreasonable Fees and Costs.

Many of the fees and costs requested by Receiver appear to be reasonable and are not disputed by Debtor. In fact, Debtor has no objection to the fees incurred by Nathan Jensen, or to a majority of the fees incurred by Daniel Boverman himself. However, a large quantity of fees and costs, especially those related to Michael Anderson, are excessive and unreasonable. The specific fees and costs disputed by Debtor are described below, separately discussed for each of the different service providers listed in Receiver's claim.

i. Boverman & Associates, LLC's Unreasonable Fees.

The first category described on Receiver's claim is the fees and expenses incurred by Boverman & Associates, LLC directly. The vast majority of those fees and expenses are not disputed by Debtor, nor does Debtor dispute the hourly rate sought for work performed by Boverman & Associates, LLC. The limited items Debtor disputes are highlighted on the attached **Exhibit A**.

The fees highlighted on Exhibit A are disputed because they lack sufficient information, or because they seek payment for travel time at Mr. Boverman's full hourly rate, contrary to LBR 2016-1(b)(2). Additionally, Debtor objects to post-petition fee entries for time spent on matters other than fulfilling Receiver's duties under § 543(a) and (b). For example, Mr. Boverman, Mr. Anderson and Receiver's counsel all appear to have spent time on preparing a motion to excuse compliance with the Receiver's duty to turnover property of the estate—a motion that was never filed. Receiver should not be compensated for time spent on an unfiled motion to oppose the Debtor's right to possession of estate property.

Debtor disputes a total of 25.05 hours of Mr. Boverman's time entries on Exhibit A. At Mr. Boverman's billed rate of \$325 per hour, Receiver's claim would be reduced by \$8,141.25 if

the disputed entries were disallowed in their entirety, or \$4,070.63 if the disputed entries were discounted by 50%.

ii. Tara Graciano's Travel Time.

Debtor's only objection to Ms. Graciano's fees are to the travel time on September 19, 2019. Ms. Graciano billed a total of 4.01 hours for travel time. This should be billed at 50% of Ms. Graciano's rate, pursuant to LBR 2016-1(b)(2). At Ms. Graciano's billed rate of \$135.00 per hour, a reduction of \$270.00 is requested.

iii. Michael Anderson's Unreasonable and Excessive Fees.

Unlike the fees for the other service providers, which have relatively few disputed entries, the fees sought for Mr. Michael Anderson are wildly excessive. Mr. Anderson's minimum billing increments are 0.25 hours, which is unreasonable and does not comply with LBR 2016-1(b)(1). Mr. Anderson billed his full rate for numerous trips to and from the dairy, which does not comply with LBR 2016-1(b)(2). There are several duplicative items, and several items fail to contain an adequate description. Additionally, like Mr. Boverman and his counsel, Mr. Anderson spent time on an unfiled motion to oppose Receiver's duty to turnover estate property to the Debtor. None of that time should be compensated. Finally, for certain services performed, Mr. Anderson's proposed rate of \$245.00 per hour is unreasonable. Debtor disputes all of the entries highlighted on the attached **Exhibit B**.

Debtor disputes a total of 109.50 hours of Mr. Anderson's time entries on Exhibit B. At Mr. Anderson's billed rate of \$245 per hour, Receiver's claim would be reduced by \$26,827.50 if the disputed entries were disallowed in their entirety, or \$13,413.75 if the disputed entries were discounted by 50%.

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3. Receiver's Claim for Attorney Fees Should be Reduced.

In the event that Receiver is not completely barred from recovering attorney fees for failing to comply with the Oregon Receivership Code, Receiver's claim for attorney fees should be reduced to disallow post-petition fees that were not related to assisting the Receiver complete its duties under § 543(a) and (b).

a. Legal Standard for Receiver's Attorney Fees.

§ 503(b)(4) provides that a superseded custodian may seek allowance of an administrative claim for *reasonable* attorney fees, and for actual, necessary expenses incurred by such attorney. 11 U.S.C. § 503(b)(4). "There is no question that the Receiver's counsel is entitled to fees under § 503(b)(4) for services directly related to the process of turning over property of the estate in the Receiver's control and providing the required accounting." *In re 29 Brooklyn Ave., LLC*, 548 B.R. 642, 646 (Bankr. E.D.N.Y. 2016). Further, "the Bankruptcy Code contemplates that additional legal services will be incurred in preparing the custodian's application for payment...." *Id.* (internal citations omitted).

Regarding fees incurred in defending a claim, Receiver cites *In re 29 Brooklyn Ave*, 548 B.R. 642, 648 (Bankr. E.D.N.Y. 2016), for the proposition that all fees in defending a superseded receiver's claim are *per se* awardable. *See* ECF No. 104, at p. 7. However, in making this argument, Receiver oversimplifies the holding of the case.

In *29 Brooklyn Ave.*, the bankruptcy court awarded a superseded receiver attorney fees related to defense of the receiver's claim. But, in doing so, the court did not hold that all fees incurred in defending a claim are compensable. Instead, the court distinguished its case from the issue presented in the U.S. Supreme Court's decision in *Baker Botts L.L.P. v. ASARCO LLC*, 135 S. Ct. 2158, 2161, 192 L. Ed. 2d 208 (2015), and adopted the Ninth Circuit's framework for

evaluating fee requests under § 503(b)(4). *In re 29 Brooklyn Ave., LLC*, 548 B.R. at 648.

The Ninth Circuit’s framework in *In re Wind N’ Wave*, 509 F.3d 938 (9th Cir. 2007), is that fees incurred in defending an application for compensation are allowable if the services otherwise meet the requirements of § 330(a), and the case “exemplifies a set of circumstances where litigation was necessary.” *Id.* at 943 (*quoting In re Smith*, 317 F.3d 918, 928 (9th Cir.2002)) (internal quotations omitted). Under *Wind N’ Wave* and *Smith*, the set of circumstances indicating that such services are “necessary” include: (1) that the prosecution or defense of the fee application was successful; (2) that the objections to the fee application were meritless; (3) that the litigation is not pursued simply to increase legal fees; and (4) that the expenses incurred are unavoidable. *Id.* at 946.

Using the *Wind N’ Wave* framework, the court in *29 Brooklyn Ave.* found that the litigation was “necessary” because the receiver substantially prevailed in its fee application, and because the “Debtor’s broad-based effort to disallow the Receiver’s proof of claim in its entirety based on allegations of mismanagement was “misplaced” and “misunderst[ood] the legal standard.” *In re 29 Brooklyn Ave., LLC*, 548 B.R. at 649. The court also found that the debtor was the cause of the excessive litigation, and that the process was the only method by which the receiver could receive his due compensation. *Id.* Thus, there is no *per se* rule that a receiver is entitled to recover all attorney fees incurred in defending its claim, and there’s certainly no authority that such a rule that is binding in the Ninth Circuit.

b. Receiver Should Not Be Awarded Fees Incurred to Resist Turnover of Estate Property, to Dispute Priority of Its Claim, or to Defend Its Claim

Debtor does not object to any pre-petition fee entry, nor does Debtor object to counsel’s hourly rates. Debtor’s objection is only to those post-petition fee entries highlighted on the attached **Exhibit C**, as those fees were not in furtherance of Receiver’s turnover and accounting

duties set forth in § 543(a) and (b). As discussed above, Receiver's counsel incurred fees to prepare and review a motion to excuse compliance with § 543(a) and (b), but such motion was never actually filed. Receiver should not be able to recover from the estate for such fees. If the foregoing objection is sustained, it would result in a reduction of 12.8 hours of billed time, or approximately \$5,120.00.

Additionally, for any post-petition fees not currently listed on Receiver's Claim ("***Additional Fees***"), Receiver should not recovery any of those fees. First, with respect to Receiver's priority dispute with KeyBank, Receiver was not the prevailing party on that issue. Second, those fees cannot be considered related to the defense of Receiver's claim, as was the case in *29 Brooklyn Ave*. Instead, Receiver aggressively sought to prime KeyBank's security interest using a tortured argument that the state receivership statute somehow superseded the Bankruptcy Code's priority scheme. It was Receiver's aggressive approach that caused it to incur Additional Fees, not any action of the Debtor, which completely distinguishes the case from the *29 Brooklyn Ave*. and *Wind n' Wave* cases.

CONCLUSION

Wherefore, Debtor respectfully requests that Receiver's claim be allowed at reduced amounts after Receiver meets his burden of proof that fees and costs sought are reasonable under federal law, and after a state court determination on whether Receiver's failure to comply with state law bars recovery of Receiver's professional fees.

Dated March 9, 2020

MOTSCHENBACHER & BLATTNER LLP

/s/ Nicholas J. Henderson

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EXHIBIT A
DISPUTED TIME ENTRIES FOR DANIEL J. BOVERMAN

<u>Date</u>	<u>Hours</u>	<u>Notes on Activities - Not Comprehensive</u>
Friday, September 6, 2019	0.60	Calls with Tara Schleicher re: Boverman declaration, lender declaration, other and related matter; review and edit draft Boverman declaration; approve final; review lender declaration.
Tuesday, September 10, 2019	0.30	Review documents filed.
Tuesday, September 10, 2019	0.50	Call with Mike Anderson re: situation and his assistance
Tuesday, September 10, 2019	0.20	Call with Lenny Davis
Tuesday, September 10, 2019	0.10	Call to Tara Schleicher
Wednesday, September 11, 2019	0.20	Send agreement and background information to Mike Anderson
Thursday, September 12, 2019	0.20	Call with Therese Nelson
Thursday, September 12, 2019	0.25	Call with Tara Schleicher re: upcoming hearing and related matters
Friday, September 13, 2019	0.60	Call with Mike Anderson
Friday, September 13, 2019	0.20	Call with Tara Graciano
Monday, September 16, 2019	0.40	Pull property tax information from county website and review
Monday, September 16, 2019	0.20	Call with Rick Wolf re: company, situation and potential involvement
Tuesday, September 17, 2019	0.80	Call with KeyBank and counsel re: hearing and related matters
Tuesday, September 17, 2019	0.80	Call with Mike Anderson re: dairy / hearing etc.
Tuesday, September 17, 2019	0.40	Contact tenants by email re: Rialto inspections / permission to access.
Tuesday, September 17, 2019	0.20	Call with Tara Schleicher re: PSA amendment
Tuesday, September 17, 2019	1.30	Drive to Tillamook
Tuesday, September 17, 2019	0.30	Review creditor list and email Tara Graciano re: accounting in general and putting in Excel
Wednesday, September 18, 2019	0.30	Review Excel creditor list
Wednesday, September 18, 2019	1.50	Prior discussions and attendance at hearing
Wednesday, September 18, 2019	7.00	Meetings and visits to facilities with Brent Thompson of Key Bank and Mike Anderson; follow on discussions;
Wednesday, September 18, 2019	1.20	Call with Karen Casale regarding receivership order, documents, information, operations, vendors and other matters
Thursday, September 19, 2019	6.50	Meetings and discussions onsite with regarding operations and other matters.
Thursday, September 19, 2019	0.40	Consider and respond to email from Paula Wolf re: payments; email Tara Schleicher on same
Friday, September 20, 2019	4.60	Visit the dairy for meetings with Valery Silva, Nathan Jensen, Mike Anderson re: herd, nutrition, values and other matters. Herd count and inspection. Call with potential buyer. Calls with Tara Schleicher re: case matters.
Friday, September 20, 2019	2.40	Meeting with Kate Lott and Brian Gibson of Tillamook regarding situation, plan, walk farm / inspect herd. Follow on discussions with Mike Anderson.
Friday, September 20, 2019	1.10	Call with Paula Wolf
Friday, September 20, 2019	0.30	Call with Mike Anderson re: operations / tasks and other matters
Saturday, September 21, 2019	0.30	Correspondence with Paula Wolf and Tara Schleicher
Saturday, September 21, 2019	0.80	Case administration
Saturday, September 21, 2019	0.30	Call with Mike Anderson re: Tillamook agreement and other matters.
Saturday, September 21, 2019	0.10	Correspondence with Paula Wolf re: cows
Sunday, September 22, 2019	0.70	Work on buyer list and notes, research online.
Sunday, September 22, 2019	0.50	Prepare update email to Key Bank
Sunday, September 22, 2019	0.60	Review Paula Wolf separate agreement, create amortization schedule verifying payment amount, email Mike Anderson and Tara Graciano regarding terms of agreement / animals, and Tara Schleicher re: nature of obligations and insurance.

Monday, September 23, 2019	0.05	Place call to Country Financial re: insurance
Monday, September 23, 2019	0.30	Call with Sofia at SAIF re: change in address and additional insured, send order.
Monday, September 23, 2019	0.10	Call with Chad re: visit / sale
Monday, September 23, 2019	0.25	Call with Karen re: bank accounts / herd / Juan
Monday, September 23, 2019	0.15	Call with Mike Anderson re: herd, Juan, related matters
Monday, September 23, 2019	0.20	Discuss conversations with Eric Silva, cattle location and other matters with Tara Schleicher
Monday, September 23, 2019	0.20	Call with and email to Victor Saldanha of Key Bank re: new DDA
Monday, September 23, 2019	0.50	Call with Mike Anderson re: Herd, operations, staff, buyers and other matters
Tuesday, September 24, 2019	0.40	Call with Mike Anderson re: Eric Silva; herd, schedule etc.
Tuesday, September 24, 2019	0.20	Correspondence with Eric Silva
Tuesday, September 24, 2019	0.20	Correspondence with Tara Schleicher
Tuesday, September 24, 2019	0.50	Meet with Key Bank to open new account
Tuesday, September 24, 2019	1.80	Call with Mike Anderson and Eric Silva re: operations, herd and related matters
Tuesday, September 24, 2019	0.25	Call with Albert Nunes of Genske Mulder re: thoughts on the dairy
Tuesday, September 24, 2019	0.25	Call with Ben, Wustenburg, Vet., about increasing services / situation generally
Tuesday, September 24, 2019	0.70	Call with Mike Anderson re: operations, staff, situation generally, financial tasks
Wednesday, September 25, 2019	0.30	Call and correspondence with Mike Anderson, Key Bank and Tara Schleicher re: payment deferral.
Wednesday, September 25, 2019	0.20	Correspondence and call with Eric Siva re: animals to be sold
Wednesday, September 25, 2019	0.40	Call with Mike Anderson
Thursday, September 26, 2019	0.15	Call with Mike Anderson re: herd / government funding application and other matters
Friday, September 27, 2019	0.20	Review USDA form, prepare email to Heidi Dugan at USDA
Friday, September 27, 2019	0.50	Call with Mike Anderson re: operations / herd etc.
Friday, September 27, 2019	0.30	Call with Mike Anderson re: operations / herd etc.
Friday, September 27, 2019	0.10	Call with Rick Taylor
Friday, September 27, 2019	0.10	Call with Tara Schleicher re: animals offsite / potentially sold / Eric Evans email
Friday, September 27, 2019	1.00	Complete paperwork for UDA program; drive to Hillsboro and back to deliver paperwork and check to USDA
Friday, September 27, 2019	0.05	Call with Mike Anderson re: offsite animals and pickup repair
Friday, September 27, 2019	1.00	Call with Jessica Cegavske of Rialto - update
Friday, September 27, 2019	0.05	Place call to Robert Obrist
Friday, September 27, 2019	0.25	Call with Carl Zweifel re: cutting corn
Friday, September 27, 2019	0.03	Return call from Cornell Casbergen
Friday, September 27, 2019	0.15	Review and approve letter to Eric Evans re: animals / order
Saturday, September 28, 2019	0.20	Working group / to do notes
Tuesday, October 1, 2019	0.20	Call with Eric Silva
Wednesday, October 2, 2019	0.05	Reply to Tara Schleicher re: missing animals / conversation with Mr. Silva.
Wednesday, October 2, 2019	0.20	Call Mike Anderson re: dairy operations
Wednesday, October 2, 2019	0.10	Call with Tara Schleicher re: missing animals and other case matters
Wednesday, October 2, 2019	0.20	Call with Brent Thompson of KeyBank re: missing animals
Friday, October 4, 2019	0.50	Review email from Mike Anderson re: operations; call re: operations, herd, going concern sale, schedule.
Friday, October 4, 2019	0.30	Call with Nathan Jensen re: compensation, Eric Silva and other matters.
Friday, October 4, 2019	0.50	Call with Eric Silva regarding need to limit involvement to contact with me vs. others; missing animals and required information and relate matters.
Saturday, October 5, 2019	0.10	Review and consider email from Paula Wolf
Saturday, October 5, 2019	0.30	Call with Mike Anderson re: email from Paula Wolf, Mike's discussions with Nathan Jensen and prospective Farm buyer
Saturday, October 5, 2019	0.10	Reply to Paula Wolf
Saturday, October 5, 2019	0.05	Further correspondence with Paula re: call.
Saturday, October 5, 2019	0.10	Correspondence with Tara Schleicher
Sunday, October 6, 2019	0.10	Review email from Kate Lott of Tillamook, email Mike Anderson re: same.

Sunday, October 6, 2019	0.10	Review and comment on Nathan Jensen work plan.
Sunday, October 6, 2019	0.20	Review post by Eric Silva, related correspondence.
Sunday, October 6, 2019	0.10	Correspond re: milk testing issue
Sunday, October 6, 2019	0.20	Email to Tara Graciano re: equipment and lease / loan summary
Sunday, October 6, 2019	0.40	Review leases and loan documents scanned by Tara
Sunday, October 6, 2019	0.20	Prepare form of consulting agreement for Nathan Jensen
Sunday, October 6, 2019	0.50	Calls and correspondence with Mike Andersen re: antibiotics issues and related matters.
Monday, October 7, 2019		Drive to dairy
Monday, October 7, 2019	4.75	Meetings with Mike Anderson, Nathan Jensen re: operations, herd, herd sales, farm sale, buyers, corn and other matters. Calls with KeyBank, discussions with Tillamook, call with Chad Lowry.
Monday, October 7, 2019	1.50	Drive back from dairy
Monday, October 7, 2019	0.55	Call with prospective buyer
Monday, October 7, 2019	0.10	Call with prospective buyer
Tuesday, October 8, 2019	0.60	Call with prospective buyer
Tuesday, October 8, 2019	0.60	Call with Mike Anderson re: corn, buyers, Eric Silva meeting
Tuesday, October 8, 2019	0.30	Open and review mail
Tuesday, October 8, 2019	0.15	Call with Mike Spence of AgDirect
Tuesday, October 8, 2019	1.50	Drive to dairy
Tuesday, October 8, 2019	3.00	Meetings with Chad Lowry of Toppenish and Nathan Jensen re: herd; inspect herd; call with Purina; meeting with prospective herd buyer; discussions regarding workforce compensation; prepare payments;
Tuesday, October 8, 2019	1.50	Drive back from dairy
Wednesday, October 9, 2019	1.50	Drive to dairy
Wednesday, October 9, 2019	2.00	Meetings with Lowell Chaffey of Dairy Cattle Sales and Nathan Jensen re: herd; inspect herd; call with Brandy
Wednesday, October 9, 2019	1.50	Drive back from dairy
Wednesday, October 9, 2019	0.50	Call with potential farm buyer
Wednesday, October 9, 2019	0.50	Call with Tara Schleicher re: various case matters including missing animals, Mr., Silva, heifer sale, PSA structure, buyers, operations and other matters.
Wednesday, October 9, 2019	0.50	Further call with Tara Schleicher re: heifer sale and other matters.
Thursday, October 10, 2019	0.10	Consider and correspond re: voice message from Tillamook County Sherriff.
Thursday, October 10, 2019	0.20	Call with Mike Anderson re: asset sales and operations
Thursday, October 10, 2019	0.40	Call with Nathan Jensen re: heifer sale and other matters'
Friday, October 11, 2019	0.05	Return call from Carl Zweifel re: silage
Friday, October 11, 2019	0.05	Place call to Lowell Chaffey
Friday, October 11, 2019	0.20	Call with Detective Bettencourt of Tillamook County Sherriff
Friday, October 11, 2019	0.30	Correspond with Nathan Jensen and Mike Anderson re: operations
Friday, October 11, 2019	0.20	ODA return call re: permits and fees.
Friday, October 11, 2019	0.25	Call with Nathan Jensen re: buyer visit / due diligence / corn
Friday, October 11, 2019	0.20	Call and correspondence with Linda Miller of Altis, collection agent for Pioneer
Monday, October 14, 2019	0.05	Place call to Chad Lowrey
Monday, October 14, 2019	0.05	Place call to Lowell Chafee
Tuesday, October 15, 2019	0.50	Call with Tara Schleicher
Wednesday, October 16, 2019	0.40	Call and correspondence with Tara Graciano re: vendors and A/P
Wednesday, October 16, 2019	0.10	Call with Vendor
Wednesday, October 16, 2019	0.20	Call with Patti- broker for possible farm buyer
Thursday, October 17, 2019	1.10	Call with Mike Anderson regarding operations and asset sales matters.
Thursday, October 17, 2019	0.50	Call with Lois Casale regarding accounting and related matters.
Thursday, October 17, 2019	0.30	Call with interested farm buyer
Thursday, October 17, 2019	0.40	Call with Tara Schleicher re: herd, PSA, properties and related matters
Thursday, October 17, 2019	0.20	Correspondence
Thursday, October 17, 2019	0.20	Review property tax files from Tara, file, forward

Thursday, October 17, 2019	0.20	Call interested buyer
Friday, October 18, 2019	1.70	Open and review forwarded mail package, related correspondence, administration
Saturday, October 19, 2019	1.10	Call with Mike Anderson re: operations, Heifer sale, conversations with Paula Wolf and Nathan Jensen; farm sale and other matters
Sunday, October 20, 2019	0.10	Review emails and correspond with Mike Anderson re: herd
Sunday, October 20, 2019	0.50	Call with Mike Anderson heifer sell down contract and timing.
Monday, October 21, 2019	0.40	Correspondence re: herd and other matters, Toppenish contract; Nathan time;
Monday, October 21, 2019	0.30	Call and correspondence with Mike Anderson
Monday, October 21, 2019	0.10	Correspond with Tara Schleicher
Monday, October 21, 2019	0.70	Prepare for and attend call with Key Bank and Tara Schleicher
Monday, October 21, 2019	0.90	Correspondence with Eric Silva, Tara Schleicher, Mike Anderson re: various matters including personal property, heifer sale contract. Sign contract, review motion and sign declaration, scan and circulate.
Tuesday, October 22, 2019	0.25	Call with Mike Anderson re: heifer sale / operations
Tuesday, October 22, 2019	0.15	Call with Gary Steen of Kubota re: loans, email to Gary
Tuesday, October 22, 2019	0.10	Call with Butch Keter re: payable for past seed purchases.
Tuesday, October 22, 2019	0.10	Correspond re: Lebanon Auction Yard / scan and circulate check
Tuesday, October 22, 2019	2.50	Prepare for , attend and follow up regarding meeting with Tara Schleicher, Eric Silva and Nick Henderson
Tuesday, October 22, 2019	0.05	Review email from Altus / PHI
Tuesday, October 22, 2019	0.20	Review and comment on draft correspondence prepared by Tara Schleicher
Tuesday, October 22, 2019	0.70	Call with Mike Anderson re: meeting with Eric Silva, house, locks, operations, heifers
Wednesday, October 23, 2019	0.25	Call with Mike Anderson re: cattle sale
Wednesday, October 23, 2019	0.40	Call with prospective farm buyer
Wednesday, October 23, 2019	0.35	Call with Mike Anderson re: missing cows / auction
Wednesday, October 23, 2019	0.15	Call with Tara Graciano re: Lebanon Auction Yard
Wednesday, October 23, 2019	0.50	Call with Tara Schleicher and Mike Anderson re: missing cattle
Thursday, October 24, 2019	0.20	Calls and correspondence with Valery Silva, Mike Anderson, Tara Schleicher re: herd
Thursday, October 24, 2019	0.05	Call with Rebecca at Zweifel Customer Farming re: invoice
Friday, October 25, 2019	0.40	Call with realtor for prospective buyer of farm
Friday, October 25, 2019	0.20	Consider and correspond with Tara Schleicher re: questions from Paula Wolf.
Saturday, October 26, 2019	0.25	Mill check analysis
Saturday, October 26, 2019	1.00	Draft email update to KeyBank
Saturday, October 26, 2019	1.30	Call with Mike Anderson re: due diligence visit by potential farm buyer
Saturday, October 26, 2019	0.20	Calls with Mike Anderson, Nathan Jensen and Eric Silva re: Eric being at the farm
Sunday, October 27, 2019	0.20	Email Tara Schleicher re: Eric violating order; review draft email to Nick Henderson
Sunday, October 27, 2019	0.10	Scan and circulate CAFO permit
Monday, October 28, 2019	0.20	Correspond with Paul Wolf and others re: note payments
Monday, October 28, 2019	0.10	Deliver documents to Tara Graciano and discuss reporting / work plan for week
Monday, October 28, 2019	0.20	Call with realtor for potential farm buyer
Monday, October 28, 2019	0.70	Call with Mike Anderson re: inspection of farm residence; operations;
Tuesday, October 29, 2019	0.40	Prepare reply to email from Paula Wolf re: note payments, appraisal and missing animals.
Tuesday, October 29, 2019	0.10	Correspond with Paula Wolf
Tuesday, October 29, 2019	0.15	Call with Delaval re: order, send check
Tuesday, October 29, 2019	0.30	Call with potential farm buyer
Tuesday, October 29, 2019	0.10	Further call with Delaval, correspondence re: operations
Wednesday, October 30, 2019	0.10	Review, approve and pay invoice
Wednesday, October 30, 2019	0.20	Correspondence with Tara Schleicher
Wednesday, October 30, 2019	0.10	Correspond re: herd
Wednesday, October 30, 2019	0.10	Correspond re: milk check matters
Thursday, October 31, 2019	1.70	Open box of mail and review
Thursday, October 31, 2019	0.45	Call with Tara Schleicher re: potential filing and related matters

Thursday, October 31, 2019	0.60	Call with Mike Anderson re: potential filing and related matters
Friday, November 1, 2019	0.75	Call with Nathan Jensen and Paula Wolf re: bankruptcy filing
Friday, November 1, 2019	0.80	Call with Mike Anderson re: filing
Friday, November 1, 2019	0.20	Correspondence and calls with Toppenish re: auction and filing
Friday, November 1, 2019	0.30	Call with Tara Schleicher re: bankruptcy filing
Friday, November 1, 2019	0.15	Call with dairy supplier re: bankruptcy
Saturday, November 2, 2019	0.20	Correspondence
Sunday, November 3, 2019	0.50	Call with Mike Anderson re: Bankruptcy filing and request for information from counsel
Sunday, November 3, 2019	0.35	Review and complete memo re: receiver comments.
Monday, November 4, 2019	0.20	Call from Vickie White at American Jersey re: bankruptcy filing
Monday, November 4, 2019	0.30	Review email from Tara Schleicher, redline revised document, review Mike Anderson comments
Tuesday, November 5, 2019	0.30	Call with Mike Anderson re: text from Paula Wolf re: worker concerns; bankruptcy
Tuesday, November 5, 2019	0.15	Call from Mike Anderson re: further conversation with Paula Wolf
Tuesday, November 5, 2019	0.20	Call with potential buyer
Wednesday, November 6, 2019	0.80	Call and correspondence with Jack Noble, ODA, call with Mike Anderson on same.
Thursday, November 7, 2019	3.00	Calls, correspondence and case administration.
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EXHIBIT B
DISPUTED TIME ENTRIES FOR MICHAEL ANDERSON

Michael Anderson

<u>Date</u>	<u>Start</u>	<u>End</u>	<u>Hours</u>	<u>Notes on Activities - Not Comprehensive</u>
Wednesday, September 18, 2019			1.00	Travel to Tillamook County Courthouse
Wednesday, September 18, 2019			0.75	Pre hearing meeting
Wednesday, September 18, 2019			1.00	Attend Court hearing meeting
Wednesday, September 18, 2019			1.50	strategy meeting with Boverman and bank
Wednesday, September 18, 2019			0.50	Travel to Silva farm
Wednesday, September 18, 2019			0.50	review correspondence and documentation
Wednesday, September 18, 2019			2.00	tour Silva farm with Valery Silva
Wednesday, September 18, 2019			2.00	Meet with Paul Wolf and Nathan Jensen on farm history records and animal husbandry issues
Wednesday, September 18, 2019			1.50	Travel from farm to home
Thursday, September 19, 2019			1.50	travel
Thursday, September 19, 2019			2.00	Meet with Key Bank field auditor and do walk through
Thursday, September 19, 2019			0.25	meet with oda on CAFO situation
Thursday, September 19, 2019			0.25	Meeting arrangements with Nathan Jensen
Thursday, September 19, 2019			1.50	Walk through with Tara Graciano
Thursday, September 19, 2019			0.25	Tc with Chad Lowry from Toppenish Auction Yard
Thursday, September 19, 2019			1.00	Meet with Dan Boverman on strategy
Thursday, September 19, 2019			1.00	Meet with Dan Boverman and Valery Silva
Thursday, September 19, 2019			0.50	Meet with Dan Boverman
Thursday, September 19, 2019			0.25	Tc with Dan Boverman
Thursday, September 19, 2019			1.50	Travel
Friday, September 20, 2019			1.50	Travel to farm
Friday, September 20, 2019			0.25	Meet with Valery on job descriptions and schedules
Friday, September 20, 2019			3.50	Meet with Nathan Jensen and Valery Silva
Friday, September 20, 2019			0.50	Meet with Dan Boverman
Friday, September 20, 2019			0.25	Review email data
Friday, September 20, 2019			1.00	Meet with TCCA on status of relationship and farm inspection
Friday, September 20, 2019			1.00	Meet with Dan Boverman on week wrap, strategy and schedule
Friday, September 20, 2019			0.50	Tc with Nathan Jensen r/e strategy and work assignment
Friday, September 20, 2019			0.25	Tc with Dan Boverman re Wolf/Jensen conversations
Friday, September 20, 2019			0.25	Tc with Nathan Jensen about possible interest Christensen, text to Boverman
Friday, September 20, 2019			1.50	Travel from farm
Saturday, September 21, 2019			1.00	Telephone calls and texts and emails with Dan Boverman regarding status of operation, TCCA contract and new member application process, herd health issues
Sunday, September 22, 2019			0.25	Review emails and outline lists from Dan Boverman and respond
Sunday, September 22, 2019			0.50	Various texts with Nathan Jensen regarding status of work being done with herd on Sunday
Sunday, September 22, 2019			0.50	Review emails from Dan Boverman
Sunday, September 22, 2019			0.50	Review dissolution of Marriage documents from Boverman

Sunday, September 22, 2019	0.25	Review lien documents sent by Boverman
Sunday, September 22, 2019	0.25	Analyze impact on collateral and engagement
Monday, September 23, 2019	1.50	Travel to Tillamook, Beaver
Monday, September 23, 2019	3.00	Meet with Nathan Jensen regarding cattle inventories, herd health, nutrition issues, strategies
Monday, September 23, 2019	1.00	strategies
Monday, September 23, 2019	1.00	Review dairy operations, cattle, milking barn, milk house, feed, crops
Monday, September 23, 2019	0.50	Meet with Valery Silva regarding operations
Monday, September 23, 2019	0.25	Meet with Juan on employment status
Monday, September 23, 2019	0.50	Tc with NCRS on potential for dairy programs
Monday, September 23, 2019	0.25	Tc with Dave Hogan regarding receivership
Monday, September 23, 2019	0.25	Meet with CHS on cattle feed, status of corn
Monday, September 23, 2019	0.25	Find grass seed and look at plater for farm operability
Monday, September 23, 2019	0.25	Review TCCA cattle and discuss with Nathan
Monday, September 23, 2019	0.25	Tc with Dan Boverman
Monday, September 23, 2019	0.50	Tc with Dan Boverman regarding status
Monday, September 23, 2019	0.50	Review emailed documents
Monday, September 23, 2019	0.50	Tc with Nathan Jensen about cow inventories, valuation
Monday, September 23, 2019	1.50	Travel home
Tuesday, September 24, 2019	0.25	Tc with Heidi Duggan
Tuesday, September 24, 2019	0.25	Tc with Dave Hogan
Tuesday, September 24, 2019	0.50	Tc with Travis Love
Tuesday, September 24, 2019	0.50	Tc with Nathan Jensen
Tuesday, September 24, 2019	0.25	Tc with Dan Boverman
Tuesday, September 24, 2019	1.50	Tc with Dan Boverman and Eric Silva
Tuesday, September 24, 2019	0.25	Email to Armondo Macias of ODA
Tuesday, September 24, 2019	0.50	Tc with Dan Boverman
Tuesday, September 24, 2019	0.25	Tc with Heidi Duggan
Tuesday, September 24, 2019	0.50	Review email documentation
Tuesday, September 24, 2019	1.00	Tc with Nathan Jensen
Tuesday, September 24, 2019	0.25	Email to Dan Boverman on potential USDA payments
Wednesday, September 25, 2019	3.00	Travel to/from farm
Wednesday, September 25, 2019	2.00	Meet with Paul Wolf
Wednesday, September 25, 2019	1.00	Meet with Juan and Adrianna
Wednesday, September 25, 2019	0.25	Tc with Nathan Jensen
Wednesday, September 25, 2019	0.50	Meet with Valery
Wednesday, September 25, 2019	0.50	Walk and look over farm with Juan
Wednesday, September 25, 2019	0.25	TCCA cows moved
Wednesday, September 25, 2019	0.50	Tc with Nathan Jensen
Wednesday, September 25, 2019	1.00	Tc with Dan Boverman
Wednesday, September 25, 2019	0.25	Tc with Heidi Duggan at USDA
Wednesday, September 25, 2019	0.25	Tc with Dan Boverman
Wednesday, September 25, 2019	0.75	Tc with Ben Wustenburg
Wednesday, September 25, 2019	0.50	Review documents from USDA
Thursday, September 26, 2019	3.00	Travel to/from farm
Thursday, September 26, 2019	0.25	Tc with Heidi Duggan
Thursday, September 26, 2019	0.25	Tc with Dan Boverman

Thursday, September 26, 2019	0.25	Tc with Dave Hogan
Thursday, September 26, 2019	0.25	Tc with Nathan Jensen
Thursday, September 26, 2019	0.50	Tc with Dan Boverman
Thursday, September 26, 2019	4.00	Meet with Nathan Jensen on Cattle inventory, nutrition, values, operations, corn plan, recruiting
Thursday, September 26, 2019	1.00	Review dairy farm
Thursday, September 26, 2019	0.25	Meet with Don Ball
Thursday, September 26, 2019	0.25	Tc with Dan Boverman on cattle inventory issues
Friday, September 27, 2019	0.25	Tc with Dan Boverman regarding cattle not owned
Friday, September 27, 2019	0.25	Tc with Heidi regarding status
Friday, September 27, 2019	0.25	Other USDA follow up
Friday, September 27, 2019	0.25	Emails and texts from Dan and Tara
Friday, September 27, 2019	0.25	Emails from Paula and Nathan
Friday, September 27, 2019	0.25	Animals not owned issues
Friday, September 27, 2019	0.25	Review TCCA lab card and operations with Nathan
Friday, September 27, 2019	0.75	Tc with Dan Boverman
Friday, September 27, 2019	0.25	Tc with Dan Boverman on USDA, Nathan
Friday, September 27, 2019	0.25	Tc with Dan Boverman on Silva case
Friday, September 27, 2019	0.50	Tc with Nathan Jensen on emergency repairs, animal health issues
Friday, September 27, 2019	0.50	Tc with Dan Boverman about Eric Evans, Nathan Jensen emergency animal health issue
Friday, September 27, 2019	0.25	Review Tara email, advise
Friday, September 27, 2019	0.25	Review financial information from Karen sent by Boverman
Saturday, September 28, 2019	0.25	Tc with Lowell Chaffee regarding cattle for sale
Saturday, September 28, 2019	0.25	Tc with Dave Hogan re strategic
Saturday, September 28, 2019	2.00	Work on pulling together notes for Monday presentation
Sunday, September 29, 2019	0.25	Tc with Paula Wolf
Sunday, September 29, 2019	2.00	Work on notes and analysis for Monday presentation
Monday, September 30, 2019	1.50	Travel to farm
Monday, September 30, 2019	1.00	Review dairy farm
Monday, September 30, 2019	0.50	Review silage plan, corn and storage pits
Monday, September 30, 2019	1.00	Tc with Nathan Jensen re herd health, equipment, employees, nutrition, silage plan
Monday, September 30, 2019	0.50	Meet with Valery
Monday, September 30, 2019	0.50	Draft notes and emails
Monday, September 30, 2019	0.25	Review TCCA documents, Boverman emails
Monday, September 30, 2019	0.25	Prepare for TC with Boverman
Monday, September 30, 2019	4.25	TC with Dan Boverman on update and strategy
Monday, September 30, 2019	0.50	Tc with Nathan Jensen
Monday, September 30, 2019	1.50	Travel back from farm
Tuesday, October 1, 2019	3.00	Travel to/from farm
Tuesday, October 1, 2019	2.00	Review Silage operations
Tuesday, October 1, 2019	1.00	Tc with Nathan Jensen
Tuesday, October 1, 2019	0.50	Meet with Valery
Tuesday, October 1, 2019	0.50	Tc with Dan Boverman re strategy, cash flow, auction
Tuesday, October 1, 2019	0.75	Work on cattle plan, Nathan plan
Tuesday, October 1, 2019	0.25	Review correspondence
Wednesday, October 2, 2019	0.25	Tc with Nathan Jensen regarding jersey marketing services

Wednesday, October 2, 2019	0.50	Review correspondence, emails to Kate Lott
Wednesday, October 2, 2019	0.25	Discuss jersey marketing services with Dan Boverman
Wednesday, October 2, 2019	0.50	Work with Nathan on new feed program
Wednesday, October 2, 2019	0.50	Work on draft of work plan
Wednesday, October 2, 2019	0.25	Tc with FSA on status of farm program revenues
Thursday, October 3, 2019	0.25	Texts to Dan on feed purchasing issues TCCA, Chaffee, Feed issues
Thursday, October 3, 2019	0.25	Tc with Darla Dubois at TCCA re feed programs
Thursday, October 3, 2019	0.50	Tc with Nathan Jensen work plan
Thursday, October 3, 2019	1.50	Work on Nathan Jensen work plan
Thursday, October 3, 2019	0.50	Tc with Greg Lacin from jersey marketing services
Thursday, October 3, 2019	0.25	Tx with Lowell Chaffee
Thursday, October 3, 2019	0.50	Tc with Dan Bansen
Thursday, October 3, 2019	0.25	Nathan Jensen on equipment, fall farming
Friday, October 4, 2019	3.00	Travel to from farm
Friday, October 4, 2019	0.25	Text from Nathan Jensen
Friday, October 4, 2019	0.50	Tc with Dan Bansen re Jersey industry, TCCA dairy community, dairy principles
Friday, October 4, 2019	1.00	Tc with Nathan Jensen
Friday, October 4, 2019	1.00	Review farm operations, cattle, calves
Friday, October 4, 2019	0.50	Review corn situation
Friday, October 4, 2019	1.00	Work on work plan, lists
Friday, October 4, 2019	0.50	Review dead animal, flat tire
Friday, October 4, 2019	0.50	Make arrangements for supplies, purchase
Friday, October 4, 2019	0.75	Tc with Dan Boverman re status
Friday, October 4, 2019	0.50	Text and TC with Boverman re Eric text from Nathan
Friday, October 4, 2019	0.50	Tc with Hogan re status and next week meetings
Friday, October 4, 2019	0.50	Tc with Nathan Jensen re situation and work plan
Friday, October 4, 2019	0.50	Review mail correspondence
Saturday, October 5, 2019	0.50	Tc with Dan Boverman on status, Paula Wolf, Hogan
Saturday, October 5, 2019	0.50	Review data on missing Idaho cattle, nitrogen tanking, Paula Wolf
Sunday, October 6, 2019	0.25	Review data from Dan Bansen and send to Boverman
Sunday, October 6, 2019	0.50	Review data on antibiotic load and respond to Boverman
Sunday, October 6, 2019	0.50	Work with Valery re antibiotic situation in milk
Sunday, October 6, 2019	1.00	Review work plan and send draft to Dan Boverman for input
Sunday, October 6, 2019	0.25	Correspondence with Nathan re work plan, schedule
Sunday, October 6, 2019	0.25	Review emails from Boverman
Sunday, October 6, 2019	0.50	Texts with Kate Lott and Bryan Gibson re antibiotic issue
Sunday, October 6, 2019	0.50	Tx with Valery re antibiotic plan, test results, communication
Sunday, October 6, 2019	0.25	Review correspondence re milk checks and other
Monday, October 7, 2019	0.50	Review dairy operation
Monday, October 7, 2019	0.50	Meet with Valery Silva re employment status, antibiotic situation, part time labor
Monday, October 7, 2019	1.00	Meet with Nathan Jensen
Monday, October 7, 2019	0.25	Meet with Bryan Gibson from TCCA
Monday, October 7, 2019	3.00	Meet with Nathan Jensen and Dan Boverman
Monday, October 7, 2019	0.50	Tc with Wolf, Jensen and Boverman
Monday, October 7, 2019	0.25	Meet with Tom Seals regarding corn, status of deal

Monday, October 7, 2019	0.25	Tc with Nathan Jensen
Monday, October 7, 2019	0.25	Review correspondence re repossession and Eric Silva
Monday, October 7, 2019	0.50	Tc with Dan Boverman
Monday, October 7, 2019	0.25	Tc with Nathan Jensen
Monday, October 7, 2019	3.00	Travel to from farm
Tuesday, October 8, 2019	0.50	Tc with Nathan on corn, cattle plan
Tuesday, October 8, 2019	0.25	Tc with Dan Boverman on corn, cattle
Tuesday, October 8, 2019	0.25	Review data on antibiotic from TCCA and respond
Tuesday, October 8, 2019	0.25	Review emails on equipment, payroll, housing and respond
Wednesday, October 9, 2019	0.75	Tc with Nathan Jensen about cattle plan and cattle inventory
Wednesday, October 9, 2019	0.25	Review correspondence and respond
Thursday, October 10, 2019	0.25	Draft emails to Boverman on status
Thursday, October 10, 2019	0.25	Tc with Dan Boverman re status
Thursday, October 10, 2019	0.50	Texts with Nathan and Nathan and Dan Boverman on silage, jersey business and cattle plan
Thursday, October 10, 2019	0.25	Review data from Tara Schleicher and Dan Boverman
Thursday, October 10, 2019	0.25	Tc with Nathan Jensen
Friday, October 11, 2019	0.50	Tc and correspondence from Tara Schleicher and Dan Boverman re CAFO, water rights, equipment, etc.
Friday, October 11, 2019	0.50	Interaction with Nathan re grass planting, Valery employment status, Tom Seals, skid steer tires, corn harvest, grass planting
Saturday, October 12, 2019	0.50	Check in with Nathan on grass planting
Sunday, October 13, 2019	0.50	Tc and texts with Nathan Jensen supervising farm operations
Monday, October 14, 2019	1.00	Tc with Dan Boverman re operations, strategy
Monday, October 14, 2019	0.25	Tc with Nathan Jensen re operations, cattle movement, grass seed, sump pump, hoof trimming
Monday, October 14, 2019	0.25	Review and respond to various emails and texts relating to case
Tuesday, October 15, 2019	0.25	Tc with Nathan Jensen re operations, cattle , Delaval repairs, ODA inspection requirements
Tuesday, October 15, 2019	0.25	Various emails and texts with Nathan and Dan Boverman
Wednesday, October 16, 2019	3.00	Travel to from farm
Wednesday, October 16, 2019	1.00	Meet with Nathan Jensen re operations
Wednesday, October 16, 2019	3.00	Meet with Paula Wolf and Nathan Jensen re strategic issues
Wednesday, October 16, 2019	0.50	Tc with Heidi Duggan re status of USDA payments
Wednesday, October 16, 2019	0.25	Tc with Dan Boverman re USDA, schedule
Wednesday, October 16, 2019	0.25	Tc with Nathan Jensen re update on operating matters
Thursday, October 17, 2019	1.25	Tc with Dan Boverman re status and operations
Thursday, October 17, 2019	0.25	Email to Tara on farm programs
Thursday, October 17, 2019	0.25	Email to Heidi on farm program and discussion
Thursday, October 17, 2019	0.75	Tc and texts with Nathan Jensen re culls, update, schedule for next week, vet check, Jersey
Thursday, October 17, 2019	0.25	Heidi with USDA
Thursday, October 17, 2019	0.25	Draft emails to Tara on USDA program, auction strategy
Thursday, October 17, 2019	0.25	Review correspondence from Boverman on property taxes, meeting with Jersey Inc
Friday, October 18, 2019	3.00	Travel to from farm
Friday, October 18, 2019	2.00	Meet with Paula Wolf
Friday, October 18, 2019	1.00	Meet with Nathan Jensen
Friday, October 18, 2019	1.00	Tour farm, measure progress

Friday, October 18, 2019	0.50	Work with Nathan Jensen on herd identification
Friday, October 18, 2019	0.25	Tc with Dan Boverman and Nathan Jensen re American Jersey situation
Friday, October 18, 2019	1.00	Meet with Nathan Jensen on cattle plan progress
Friday, October 18, 2019	0.50	Check out equipment for maintenance needs
Friday, October 18, 2019	0.25	Check silage progress and condition
Friday, October 18, 2019	0.25	Check grass fields for completeness and progress
Friday, October 18, 2019	0.25	Tc with Workman's Comp people
Friday, October 18, 2019	0.50	Work on feed situation with Nathan relative to nutrition
Friday, October 18, 2019	0.25	Tc with Chad Lowry from Toppenish Livestock
Friday, October 18, 2019	0.25	Review agreement on sale of cattle from Tara Schleicher
Saturday, October 19, 2019	0.25	Correspondence with Dan and Tara on case and Paula matters
Saturday, October 19, 2019	1.00	Tc on update with Boverman on status
Saturday, October 19, 2019	0.50	Tc with Chad Lowry and Nathan Jensen re cattle movement
Saturday, October 19, 2019	0.25	Review data from Paula Wolf and respond
Saturday, October 19, 2019	0.25	Tc with Nathan Jensen re cattle movement plan schedule for next week
Sunday, October 20, 2019	0.25	Review data from Paula Wolf
Sunday, October 20, 2019	0.25	Draft memos to Boverman on \$40,000 calf, Toppenish
Sunday, October 20, 2019	0.50	Tc with Dan Boverman re cattle, Toppenish deal and information requests
Sunday, October 20, 2019	0.50	Tc with Nathan Jensen
Sunday, October 20, 2019	0.25	Email to Boverman on cattle data for Eric meeting
Monday, October 21, 2019	0.25	Emails to Dan Boverman on Toppenish, heifer sale supporting data
Monday, October 21, 2019	0.50	Tc with Nathan Jensen re cattle lists and schedule
Monday, October 21, 2019	0.25	Work on getting cattle document transmitted
Monday, October 21, 2019	0.50	Tc with Dan Boverman re Toppenish deal for Key Bank
Monday, October 21, 2019	0.50	Tc with Nathan Jensen email and texts
Monday, October 21, 2019	0.50	Tc with Dan Boverman re bank meeting
Monday, October 21, 2019	0.25	Tc with Nathan Jensen re status, data and work plan
Monday, October 21, 2019	0.25	Tc with Paula Wolf re Lebanon Auction Yard AP
Tuesday, October 22, 2019	3.00	Travel to from farm
Tuesday, October 22, 2019	0.50	Tc with Nathan Jensen
Tuesday, October 22, 2019	2.00	Review farm operations
Tuesday, October 22, 2019	0.25	Discuss milk house project with contractor
Tuesday, October 22, 2019	0.50	Review repairs list and issues with equipment
Tuesday, October 22, 2019	0.50	Meet with Juan re operations
Tuesday, October 22, 2019	0.50	Tc with Dan Boverman
Tuesday, October 22, 2019	0.25	Text to Paul, review emails on cattle issues
Tuesday, October 22, 2019	0.50	Tc with Dan Boverman re Eric Meeting and strategy
Wednesday, October 23, 2019	0.50	Tc with Nathan Jensen re Eric meeting, Louisville trip, status of farm operations
Wednesday, October 23, 2019	0.25	Tc with Chad Lowry re Toppenish sale
Wednesday, October 23, 2019	0.25	Tc with Paula Wolf
Wednesday, October 23, 2019	0.25	Tc with Dan Boverman
Wednesday, October 23, 2019	0.25	Tc with Nathan Jensen re Tillamook complaint
Wednesday, October 23, 2019	0.25	Emails to Tillamook Creamery on complaint resolution
Wednesday, October 23, 2019	0.25	Tc with Dan Boverman and Chad Lowry re cattle sale
Wednesday, October 23, 2019	0.50	Tc with Dan Boverman and Tara Schleicher re Lebanon, Valery data operations

Wednesday, October 23, 2019	0.25	Tc with Nathan Jensen re cattle plan, operations
Wednesday, October 23, 2019	0.25	Review correspondence from Tara, Tara, Nathan and Paula
Thursday, October 24, 2019	0.25	Tc with Nathan re culls and cattle loading for Friday
Thursday, October 24, 2019	0.25	Tc with Dan Boverman on meeting with Valery
Thursday, October 24, 2019	0.75	Tc with Dan Boverman and Valery re missing animals
Thursday, October 24, 2019	0.75	Tc with Dan Boverman on strategy on missing animals, Texts to Valery re house
Friday, October 25, 2019	3.00	Travel to from farm
Friday, October 25, 2019	0.50	Prepare for cattle transition
Friday, October 25, 2019	3.00	Help load cattle
Friday, October 25, 2019	0.50	Prep for Kuipers and Tippitt meeting on farm sale
Friday, October 25, 2019	3.00	Show Kuipers farm and cattle for sale
Friday, October 25, 2019	0.50	Meet with Nathan on cattle sale, strategy
Friday, October 25, 2019	0.25	Tc with Dan Boverman
Friday, October 25, 2019	0.25	Review farm
Saturday, October 26, 2019	0.25	Tc with Nathan Jensen re operations
Saturday, October 26, 2019	1.00	Tc with Dan Boverman re Garritt Kuipers, cattle sales and strategy
Saturday, October 26, 2019	0.25	Tc with Dan Boverman re Eric and review correspondence
Sunday, October 27, 2019	0.50	Review data relative to shipping cattle, review various documents from Boverman, Tc with Nathan Jensen re operations, cattle shipment, Eric, schedule
Monday, October 28, 2019	3.00	Travel to from farm
Monday, October 28, 2019	0.75	Review Eric home situation, take pictures for boverman and discuss
Monday, October 28, 2019	1.25	Review farm operations, premises, barns status of field crops, discuss crop plans with Nathan
Monday, October 28, 2019	0.50	Work on repair issues
Monday, October 28, 2019	0.50	Work on possible problem with antibiotic cow in milk stream
Monday, October 28, 2019	1.00	Tc with Dan Boverman re operations, strategy, repairs
Monday, October 28, 2019	0.50	Review week schedule with Nathan
Monday, October 28, 2019	0.50	Meet with Garritt Kuipers re farm purchase opportunity, protocol
Monday, October 28, 2019	0.50	Work with Nathan on cattle herd organization and computer
Monday, October 28, 2019	0.50	Work with Nathan on Toppenish load for Tuesday
Tuesday, October 29, 2019	0.50	Texts and Tc with Nathan Jensen re cattle sale, appliances, computer records, schedule
Tuesday, October 29, 2019	0.50	Sent mail and materials from farm premises to Dan Boverman
Tuesday, October 29, 2019	1.00	Work on appliance issues
Tuesday, October 29, 2019	0.25	Draft email to Dan Boverman and Tara Schleicher on USDA programs
Tuesday, October 29, 2019	0.25	Tc with Heidi Duggan re USDA program and follow-up email to Dan and Tara
Tuesday, October 29, 2019	0.25	Review correspondence from Dan Boverman and Nathan Jensen
Tuesday, October 29, 2019	1.00	Tc with Dan Boverman and Tara Schleicher re missing cattle
Tuesday, October 29, 2019	0.25	Review correspondence from Dan Boverman and Tara Schleicher
Tuesday, October 29, 2019	0.25	Tc with Nathan Jensen on cattle shipments and farm operations
Wednesday, October 30, 2019	3.00	Travel to from farm, pick up used dryer
Wednesday, October 30, 2019	0.75	Pickup used dryer for dairy barn
Wednesday, October 30, 2019	1.00	Review farm
Wednesday, October 30, 2019	1.00	Meet with Nathan Jensen on operations
Wednesday, October 30, 2019	2.00	Meet with Paula Wolf re her questions and missing animals issues
Wednesday, October 30, 2019	0.75	Tc with Dan Boverman re updates, Wolf and Jensen

Wednesday, October 30, 2019	0.50	Review emails and texts, work with Nathan on computer data
Thursday, October 31, 2019	0.75	Review notes, draft various emails in missing cattle and send to Dan Boverman and Tara Schleicher
Thursday, October 31, 2019	0.50	Follow-up emails and responses on missing cattle issues
Thursday, October 31, 2019	0.50	Purchase and pickup stove for labor housing
Thursday, October 31, 2019	0.50	Tc with Dan Boverman re possible filing for bankruptcy by Eric
Thursday, October 31, 2019	0.75	Deal with Nathan Jensen and employee issues relative to possible bankruptcy
Friday, November 1, 2019	0.50	Tc with Dan Boverman re status of case and Chapter 12 bankruptcy filing
Friday, November 1, 2019	0.50	Tc with Nathan Jensen and Paula Wolf
Saturday, November 2, 2019	0.50	Tc with Dan Boverman re status of engagement and data for bank hearing
Saturday, November 2, 2019	1.50	Work on schedule of issues for Key Bank motion
Sunday, November 3, 2019	0.50	Work on data for bank motion
Sunday, November 3, 2019	1.00	Review information, comment and discuss from Tara Schleicher on bank motion for receivership
Monday, November 4, 2019	0.50	Tc with Dan Boverman re situation
Monday, November 4, 2019	0.50	Tc with Paula Wolf
Wednesday, November 6, 2019	1.00	Review data from ODA on cattle hauling requirements, discuss with Boverman, talk with industry person Dan Bansen

229.50

EXHIBIT C
DISPUTED TIME ENTRIES FOR RECEIVER'S COUNSEL

Date	Name	Description	Hours	Amount
10/30/2019	Schleicher, Tara J	e-mail response to N. Henderson regarding additional information needed (0.1). Instructions to paralegal regarding subpoena to E. Evans and calls needed to Oregon Dept. of Agricultural at California border.	0.10	\$42.00
10/31/2019	Chiodo, Jill	Research California Department of Food & Agriculture requirements for transporting cattle into the state of California (0.4). Telephone call to CDFA inspections regarding same (0.1). Telephone call to CDFA Legal regarding filing a public records request (0.1). Transmit public records request to CDFA via email (0.1).	0.70	\$150.50
10/31/2019	Schleicher, Tara J	Review e-mails from M. Anderson regarding conversation with P. Wolf regarding missing cows and screenshot of registry site regarding \$40,000 calf (0.2); exchange e-mails with client and M. Anderson regarding course of action regarding subpoenas and D. Boverman call with K. Casale (0.2); telephone call with D. Boverman regarding call with K. Casale regarding hauling of 16 head of cows to E. Evans and other issues regarding missing cows, course of action regarding subpoenas (0.2); instructions to paralegal regarding call to Department of Agriculture (0.1); confer with P. Conti regarding subpoenas and request for production needed and course of action regarding same (0.1); exchange e-mails with client and M. Anderson regarding same (0.2).	1.00	\$420.00
10/31/2019	Schleicher, Tara J	Review e-mail from C. Russillo with e-mail from N. Henderson regarding bankruptcy filing (0.1); telephone call with C. Russillo regarding same (0.1); exchange e-mails with C. Russillo regarding same after reviewing 11 USC 543(d) and 11 USC 1104 (0.2); telephone call with D. Boverman (0.3); review e-mail from D. Boverman regarding funds paid to N. Henderson on September 18 (0.1); review e-mails from N. Henderson regarding chapter 12 filing by E. Silva (0.1); prepare e-mail to C. Russillo regarding same (0.1); calls with C. Russillo and client (voicemail) (0.1); review voicemail from N. Henderson (0.1).	1.30	\$546.00
10/31/2019	Conti, Patrick	Conference with T. Schleicher regarding case background (0.1); review background materials and emails for same (0.4); research registration requirements for Jersey Cows (0.5).	1.00	\$345.00
11/1/2019	Schleicher, Tara J	Review texts from N. Jensen re communications and actions of E. Silva (0.2); exchange e-mails with N. Henderson re auction cancellation and no communication with receiver directly (0.2); exchange e-mails with client re same (0.2); exchange e-mails with C. Russillo re motion under 543(d) (0.1); telephone call with client re status, possible motion by Key Bank to retain receiver control, reports required under bankruptcy code and statements for services rendered for submission to bankruptcy court (0.2); review e-mails between client and M. Anderson re same (0.2); exchange e-mails with C. Russillo re possible motion to remove DIP and analyze problems with same (0.2); telephone call with C. Russillo re status since bankruptcy filing, panel chapter 12 trustee, testimony needed for hearing, etc. (0.3); review e-mail from C. Russillo to N. Henderson re no use of cash collateral (0.1); review e-mail from B. Sargent re bankruptcy filing and analyze proper response (0.1).	1.70	\$714.00
11/2/2019	Schleicher, Tara J	Prepare e-mail to client re information requested by Key Bank for	0.40	\$168.00

Date	Name	Description	Hours	Amount
11/3/2019	Schleicher, Tara J	motion in bankruptcy court (0.2); exchange e-mails with client re same (0.2)		
11/3/2019	Schleicher, Tara J	Exchange e-mails with client re receipt of Tillamook check and course of action re same.	0.10	\$42.00
11/4/2019	Schleicher, Tara J	Review and analyze revisions to write up for Key Bank motion in bankruptcy court from client/M. Anderson (0.2); exchange e-mails with E. Fullerton re information from receiver needed for motion to dismiss and 543 motion (0.2); review and revise statement from client re receivership issues and exchange e-mails with client and M. Anderson re same (0.2); finalize statement and exchange e-mails with Schwabe re same (0.2); prepare e-mail to client and M. Anderson re declaration (0.1); exchange e-mails with C. Russillo re call with V. Burdette (0.1); review e-mail from C. Russillo to V. Burdette re same (0.1).	1.10	\$462.00
11/4/2019	Schleicher, Tara J	Telephone call with B. Sargent re bankruptcy filing and possible 543 motion (0.1); prepare e-mail to B. Sargent with update on 543 motion (0.1).	0.20	\$84.00
11/5/2019	Schleicher, Tara J	Telephone call with A. Poust re chapter 12 and 543 issues and call with V. Burdette to discuss same (0.1); telephone call with V. Burdette and A. Poust re status of case and receivership (0.2); review e-mail from B. Sargent to C. Russillo re bankruptcy filing (0.1); respond to same re A. Poust (0.1); review bankruptcy docket (0.1); review message from client re post by E. Silva (0.1).	0.70	\$294.00
11/6/2019	Schleicher, Tara J	Telephone call with E. Fullerton re hearing on cash collateral today and status on motions under 543 (0.1); telephone call with client re same and course of action (0.2); prepare e-mail to N. Henderson re no accounting for receiver fees as required under 543(c) in budget (0.1); telephone call with C. Russillo re course of action in bankruptcy (0.1); exchange e-mails with client re request from Oregon Department of Agriculture re branding/vet inspection on transport to auction (0.1); exchange e-mails with client re Tillamook check (0.1); telephone call with client re status, accounting required under bankruptcy code and transition tasks/timing (0.2); prepare e-mail to N. Henderson re milk checks (0.1); review response and send to client (0.1); prepare e-mail to C. Russillo re 543 requirements (0.2).	1.30	\$546.00
11/25/2019	Ayres, Jason M	Analyze 543 motion and use of cash collateral (0.4); prepare objection to use of cash collateral (0.6).	1.00	\$400.00
11/25/2019	Schleicher, Tara J	Telephone call with C. Russillo regarding bank's decision not to pay fees/costs (0.2); analyze course of action (0.6); draft objection to use of cash collateral (0.4); draft e-mail to C. Russillo regarding position of receiver and course of action (0.2); review and revise objection to cash collateral motion (0.1); exchange e-mails with C. Russillo regarding bank's position (0.1); telephone call with client regarding status, 543(c) motion, etc. (0.3); telephone call with B. Sargent regarding bank's position and notice issues with cash collateral motion (0.1).	2.00	\$840.00
11/26/2019	Schleicher, Tara J	Review objection to cash collateral motion filed by P. Wolf (0.1); review interim motion for use of cash collateral and notice of final hearing (0.1); review and revise motion to appear telephonically at hearing (0.1); review and sign motion (no charge).	0.30	\$126.00

Date	Name	Description	Hours	Amount
11/27/2019	Ayres, Jason M	Review email exchanges regarding 543 claim and payment (0.1); prepare email to counsel for Key Bank (0.2).	0.30	\$120.00
11/27/2019	Schleicher, Tara J	Review order granting motion to appear by phone and e-mail from clerk regarding interim hearing and final hearing to be set on December 13 (0.2); prepare e-mail to debtors' counsel regarding need to include receiver fees and costs in motion for use of cash collateral (0.2); review e-mail from Key Bank counsel regarding no payment from Key Bank (0.1); exchange e-mails with debtor's counsel regarding invoices (0.1); exchange e-mails with D. Boverman regarding same (0.1); briefly review notice of hearing on motion for use of cash collateral and motion for interim use (0.3).	1.00	\$420.00
12/2/2019	Schleicher, Tara J	Review invoices and e-mail to Key Bank counsel sent in early November for transmission to debtor's counsel (0.1); review motion for interim use of cash collateral (0.2); prepare email to debtor's counsel re issues with interim motion and hearing and transmission of invoices (0.1).	0.40	\$168.00
12/3/2019	Ayres, Jason M	Review schedules and prepare email to debtor's counsel regarding retainer; exchange emails with debtor's counsel.	0.30	\$120.00
12/3/2019	Schleicher, Tara J	Attend hearing on interim use of cash collateral and discuss with court topics for consideration on 543(c) motion (0.3); make notes to file re points to address in 543(c) motion (.3); review SOFA and application to employ/disclosure re retainer to N.Henderson (0.1); review e-mail from J. Ayres to N. Henderson re same (0.1); review request for information on use of milk check in early October and prepare e-mail to client re same and need to file report (0.2); analyze issue re ORS 37.270 and receiver's right to Key Bank's secured claim and review e-mails re same between J. Ayres and N. Henderson (0.2); exchange emails with client and T. Graciano re accounting/report to be filed week of December 9 (0.1).	1.30	\$546.00
12/4/2019	Schleicher, Tara J	Review e-mail from client with check register and statement for October (0.1); review draft order granting interim use of cash collateral and note issues (0.1); prepare e-mails to client and B. Sargent re insurance issue on livestock (0.1).	0.30	\$126.00
12/6/2019	Schleicher, Tara J	Exchange e-mails with N. Henderson re revisions to order on interim cash collateral use.	0.10	\$42.00
12/9/2019	Schleicher, Tara J	Telephone call with client re logistics on 543(c) motion preparation/review/filing and accounting to be filed (0.2); exchange e-mails with E. Paetsch re priming lien issue (0.1); exchange e-mails with B. Sargent re form of cash collateral order (0.1).	0.40	\$168.00
12/10/2019	Ayres, Jason M	Telephone call to counsel for Key Bank regarding priority of interests in collateral (vm); prepare follow up email.	0.20	\$80.00
12/11/2019	Ayres, Jason M	Exchange emails with counsel for Key Bank regarding security interests; prepare precautionary cash collateral objection.	0.70	\$280.00
12/11/2019	Schleicher, Tara J	Review and revise e-mail to C. Russillo re Oregon Receivership Code and lien position of Key Bank (0.1); review e-mail response and analyze same (0.1); prepare summary of precautionary objection to cash collateral based on 543 and state law rights relative to Key Bank's secured claim (0.1).	0.30	\$126.00
12/11/2019	Rhine, Kesarah	Revise Precautionary Objection to Final Cash Collateral Order.	0.20	\$43.00
12/12/2019	Ayres, Jason M	Prepare proposed language for cash collateral order and email to	0.20	\$80.00

Date	Name	Description	Hours	Amount
		debtor's counsel.		
12/12/2019	Schleicher, Tara J	Exchange e-mails with client re accounting and instructions to paralegal re format of same for filing with bankruptcy court.	0.20	\$84.00
12/13/2019	Rhine, Kesarah	Draft Receiver's First Status Report.	0.20	\$43.00
12/16/2019	Schleicher, Tara J	Review court docket notes re revisions to form of final cash collateral order.	0.10	\$42.00
12/17/2019	Rhine, Kesarah	Draft Receiver's Accounting (0.7). Draft Section 543(c) Motion for Protection of Receiver (0.4).	1.10	\$236.50
12/17/2019	Schleicher, Tara J	Draft receiver's accounting and report (0.5); commence drafting 543(c) motion (0.4).	0.90	\$378.00
TOTAL			85.15	\$32,968.75

SUMMARY OF FEES AND COSTS

Timekeeper	Total Hours	Total Amount
S. Ames	2.60	702.00
J. Ayres	3.80	1,520.00
J. Chiodo	3.60	774.00
P. Conti	1.00	345.00
J. Ellis	0.20	96.00
K. Rhine	7.45	1,601.75
T. Schleicher	66.50	27,930.00
Total Fees		\$32,968.75

Description	Amount
Filing Fee	280.00
Total Costs	\$280.00
TOTAL FEES AND COSTS	\$33,248.75